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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME FOR GOOGLE TO SUBMIT
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION TO SEAL (DKT.
291)**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 6-2, I submit this declaration in support of the Joint
7 Stipulation and [Proposed] Order Extending Time For Google To Submit Declaration In Support of
8 Plaintiffs’ Motion to Seal (Dkt. 291) (“Stipulation”).

9 3. On October 14, 2021, Plaintiffs filed their Administrative Motion to Seal Portions of
10 Plaintiffs’ Motion Seeking Relief for Google’s Failure to Obey Discovery Order (Dkts. 291-292).

11 4. On October 14, 2021, Google received unredacted copies of Plaintiffs’ Motion
12 Seeking Relief for Google’s Failure to Obey Discovery Order (Dkts. 291-292).

13 5. Pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the
14 Designating Party, to establish that such designated material is sealable, is by Monday, October 18,
15 2021.

16 6. On October 15, 2021, the Parties agreed that an extension of time of 7 days will
17 provide Google with sufficient time to review the materials in Plaintiffs’ Motion that Google
18 designated as confidential and to submit its declaration in support of its designated material in the
19 filings (Dkts. 291-292).

20 7. The Court has previously modified the case schedule by extending Plaintiffs’
21 deadline to file a brief response to the affidavit and declaration submitted in response to the Court’s
22 request (Dkt. 110) and the deadline for special master submissions (Dkt. 206) and also granted
23 parties’ stipulation to extend time to answer the complaint (Dkt. 42), to submit protective order and
24 ESI order (Dkt. 72), to extend time for submitting motion to dismiss briefing (Dkt. 73), to submit
25 proposed redactions to the April 27, 2021 hearing transcript (Dkt. 163) and June 2, 2021 hearing
26 transcript (Dkt. 246), to set a briefing schedule for Google’s motion to dismiss counts six and seven
27 of the Second Amended Complaint (Dkt. 175), and to continue discovery deadlines (Dkt. 261).

28 8. The 7-day extension will not affect the schedule in this case.

1
2 I declare under penalty of perjury of the laws of the United States that the foregoing is true
3 and correct. Executed in San Francisco, California on October 15, 2021.
4

5 DATED: October 15, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

6 By /s/ Jonathan Tse
7 Jonathan Tse

8 *Attorney for Defendant*
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